

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X Case #: **1:19-cv-02521-JBW-RER**
CHALAMO KAIKOV

Plaintiff

DECLARATION IN SUPPORT

--against--

ARIHAY KAIKOV, DUSTIN BOWMAN, ANDERSON,
BOWMAN & ZALEWSKI, PLLC,
SHIRYAK, BOWMAN, ANDERSON,
GILL & KADOCHNIKOV LLP, PACIFIC 2340
CORP., ROYALA&K REALTY GROUP INC., A&E.R.E.
MANAGEMENT CORP., NY PRIME HOLDING LLC,
AG REALTY BRONX CORP., JOHN and
JANE DOE 1-19 and XYZ CORPORATION 1-10

Defendants

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Alexander Kadochnikov, an attorney duly admitted to practice in this Court, under penalty of perjury, states as follows:

1. I am a partner with Shiryak, Bowman, Anderson, Gill & Kadochnikov, LLP ("SBAGK"), counsel for defendants and a non-party TNR Renovations, Inc. ("TNR") As Search I am fully familiar with the facts and circumstances set forth herein.
2. I'm making this declaration in support of SBAGK's motion to withdraw as counsel pursuant to Local Civil Rule 1.4 and for such other and further relief as this Court deems just and proper.

3. On September 17, 2020, SBAGK filed a motion on behalf of TNR to quash the subpoena (See Docket # 68). On October 1, 2020, this Court denied TNR's motion to quash. On November 23, 2020, this Court granted Plaintiff's motion to compel production.
4. The relationship between TNR and the undersigned began to disintegrate due to conflicting views on TNR's obligation to complying with the Court's orders regarding discovery.
5. TNR's principal has not picked up the undersigned's phone, answered a text message or email since December 18, 2020, despite the undersigned's numerous attempts.
6. This motion is being served on TNR at its last known mailing address and via email.
7. No prior application for relief requested herein has been made

Dated: January 13, 2021
Kew Gardens, New York

/s/ Alexander Kadochnikov, Esq.
Shiryak, Bowman, Anderson, Gill & Kadochnikov, LLP
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